

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

2020 FEB 26 AM 11:05

In the Matter of the Search of

USPS Priority Mail parcel 9405 5368 9784 6368 5986 21
 addressed to "MADISON CORRECTIONAL INSTITUTION
 JAMAL BRADLEY A509031 P.O. BOX 740 LONDON OH
 43140-0740"

Case No.

2:20-mj-139

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property

USPS Priority Mail parcel 9405 5368 9784 6368 5986 21 addressed to "MADISON CORRECTIONAL INSTITUTION JAMAL
 BRADLEY A509031 P.O. BOX 740 LONDON OH 43140-0740"

located in the Southern District of Ohio, there is now concealed (*identify the person or describe the property to be seized*):

A quantity of a controlled substance and/or proceeds which are evidence thereof, and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b).

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section

21 U.S.C. 841(a)(1)
 21 U.S.C. 843(b)

Offense Description

Possession with intent to distribute a controlled substance
 Prohibited use of a communication center (U.S. Mail)

The application is based on these facts:

As set forth in the attached Affidavit of Postal Inspector Justin D. Koble

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Justin D. Koble, U.S. Postal Inspector

Printed name and title



Hon. Elizabeth A. Preston Deavers, U.S. Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence.

Date: 2/26/2020

City and state: Columbus, Ohio

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN THE MATTER OF THE SEARCH OF:

United States Postal Service Priority Mail
parcel bearing tracking number 9405 5368
9784 6368 5986 21 addressed to
“MADISON CORRECTIONAL
INSTITUTION JAMAL BRADLEY A509031
P.O. BOX 740 LONDON OH 43140-0740”

Case No. 2:20-mj-139

MAGISTRATE JUDGE
Chelsea M Vascura

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Justin D. Koble, Postal Inspector, being duly sworn, depose and state as follows:

1. I have been a U.S. Postal Inspector for the past 5 years, enforcing federal mail and drug laws; currently assigned to Columbus, OH. I have received training at the U.S. Postal Inspection Service National Training Seminars for mail-related criminal investigations and have investigated cases with other federal, state, and local police units.
2. The U.S. Postal Inspection Service is aware that drug traffickers have been using Priority Mail Express, a business-oriented service offered by the Post Office, to transport controlled substances and transfer funds, cash or otherwise, to further their enterprises. As a result of past investigations and prosecutions, the Postal Inspection Service has determined that a number of indicators can be used to identify packages containing contraband that have been entered into the Priority Mail Express network. Inspectors routinely review shipment documents and Priority Mail Express parcels originating from or destined to drug source areas to identify instances where there is a possibility of drug trafficking.
3. This affidavit is made in support of an application under Rule 41 of Federal Rules of Criminal Procedure, for a warrant to search for and seize evidence, instrumentalities, contraband, and fruits of violations of Title 21, United States Code, Sections 841(a)(1) (manufacturing, distribution, or possession with the intent to manufacture or distribute a controlled substance), and 843(b) (unlawful use of a communication facility in the commission of a crime), from the Priority Mail parcel bearing United States Postal Service (USPS) tracking number 9405 5368 9784 6368 5986 21 (hereinafter, the “Subject Parcel”). The information contained in this affidavit is information that I know based on my personal training, knowledge, and experience, as well as information obtained from other law enforcement agents. This application is being submitted for the specific purpose stated above. I have not, therefore, included every fact known to me concerning the investigation.
4. On February 21, 2020, US Postal Inspectors in Columbus, OH identified the Subject

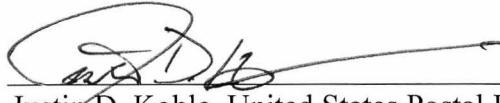
Parcel while reviewing mailing labels associated with a current drug trafficking investigation. At that time, the mailing label for the Subject Parcel had been generated however the parcel had not been remitted to USPS. USPS records indicate the Subject Parcel was first scanned at a USPS mail processing facility in Phoenix, AZ at 2:26 a.m. on February 22, 2020, indicating the parcel was most likely deposited into a USPS collection box as opposed to being brought into a post office.

5. On February 24, 2020, the Subject Parcel was scanned as "Delivered, PO Box" at the London, OH 43140 Post Office. US Postal Inspectors contacted investigators at the Madison Correctional Institution for assistance. At the request of US Postal Inspectors, an investigator was able to intercept the Subject Parcel at the Madison Correctional Institution mail room prior to the parcel being delivered to the inmate.
6. The investigator provided US Postal Inspectors with a photograph of the Subject Parcel. The Subject Parcel was observed to be addressed to "MADISON CORRECTIONAL INSTITUTION JAMAL BRADLEY A509031 P.O. BOX 740 LONDON OH 43140-0740" with a return address of "R AND R ADVISORS LLC 1204 BASELINE RD SUITE 106 TEMPE AZ 85283". The Subject Parcel is a manila envelope measuring approximately 9" x 12" x 1" and weighing approximately 14 ounces. The Subject Parcel is stamped "URGENT LEGAL ACTION!" in two places on the front. \$6.30 in electronic postage is affixed to the front of the parcel.
7. Your affiant is aware R & R Advisors LLC is a business currently registered with the state of Arizona. R & R Advisors LLC lists 1204 E Baseline Rd, Suite 106, Tempe AZ 85283 as a current address.
8. Your affiant is aware that beginning in December 2019, US Postal Inspectors in Columbus, OH and Phoenix, AZ have seized USPS parcels bearing a return address of "BLISS LIFE AND STYLE, 4345 W DUBLIN GRANVILLE RD, DUBLIN OH 43017". Searches of these parcels have resulted in the seizure of cocaine and fentanyl and the identification of \$16,600 in US currency. USPS records indicate at least five parcels bearing this same return address have been delivered to R & R Advisors LLC, 1204 E Baseline Rd STE 106 Tempe, AZ 85238 between October 21, 2019 and the present.
9. Your affiant knows from previous training, experience and seizures, the type of electronic postage affixed to the Subject Parcel is associated with illegal Dark Web activity. The postage meter used to purchase this electronic postage is currently leased by the USPS to a shipping company doing business as EasyPost. EasyPost then subleases this particular meter to a company doing business as Bitcoinpostage.info. Bitcoinpostage.info sells USPS postage in exchange for bitcoin payment allowing users to anonymously purchase postage and print mailing labels. The ability to purchase USPS postage using bitcoin, a form of electronic currency, is appealing to individuals involved in the sale and distribution of controlled substances on dark web marketplaces because it allows for the purchase of this postage without having to first convert funds to US currency.
10. The portion of the electronic postage label affixed to the Subject Parcel was found to

have the area which should have indicated "EasyPost" whited out. Your affiant is aware of online forums discussing the shipping of controlled substances bought and sold on the dark web, caution against utilizing this particular EasyPost account and acknowledge law enforcement frequently targets parcels bearing EasyPost postage for seizure. Your affiant believes the mailer of the Subject Parcel removed the EasyPost portion of the label in an attempt to reduce the likelihood of identification and potential seizure of the parcel by law enforcement. Throughout the course of this investigation, this technique has been observed on numerous parcels mailed by this particular drug trafficking organization.

11. On February 24, 2020, Madison Correctional Institution investigators contacted Officer Michael Combs, London Police Department, who is the handler for "Ygor," a drug detection dog most recently certified by the Ohio Peace Officers Training Council for the detection of marijuana, hashish, cocaine, "crack," heroin, and methamphetamine. K-9 "Ygor" has had 200 hours of training at Gold Shield Training Kennels, Blacklick, OH, a well-established and regarded training facility for police canines. Both in training and actual deployments, K-9 "Ygor" has successfully detected narcotics; demonstrating clear, positive, aggressive (scratch) alerts, establishing himself as a highly reliable police dog.
12. The Subject Parcel was hidden among other parcels, and K-9 "Ygor" was allowed to search the entire area. Officer Combs concluded that K-9 "Ygor" did alert positively to the Subject Parcel. Based on that alert, Officer Combs concluded that the odor of one of the drugs that K-9 "Ygor" is trained and certified to detect was present.
13. Based on the information contained herein, your affiant maintains there is probable cause to believe the USPS Priority Mail parcel bearing tracking number 9405 5368 9784 6368 5986 21, the Subject Parcel, contains controlled substances and/or contraband, in violation of Title 21, United States Code, Sections 841(a)(1) and 843(b). Based on the facts set forth in this affidavit, I submit that there is probable cause to believe that controlled substances are being concealed in the parcel, and seek the issuance of a warrant to search the parcel for controlled substances to be seized.

Respectfully submitted,



Justin D. Koble, United States Postal Inspector

Subscribed and sworn to before me on February 26, 2020.

Honorable Elizabeth A Preston Deavers
UNITED STATES MAGISTRATE JUDGE

